REMARKS

Claims 1, 2, 4-6, and 8--22 are pending in the application. Favorable reconsideration in light of this Supplemental Reply and the previously filed Reply is respectfully requested.

The Supplemental Reply

This Supplemental Reply is filed to correct a typographical error in original claim 11; namely, that the word "aliphatic" was mistakenly absent. In this paper, the word "aliphatic" is present as it is indeed in the originally filed version of original claim 11. It is believed that this mistake has not altered the decision of the Examiner.

This Supplemental Reply is also filed to correct two typographical errors in the Obviousness Argument. The accurate argument with changes made appears as follows. The two changes (one underlined for an addition and one strikethrough for a deletion) are shown for the Examiner's convenience.

The Obviousness Rejection

Claims 1-9, 15, and 16 have been rejected under 35 U.S.C. § 103(a) over Rieber et al (U.S. Patent 4,235,794). To establish a *prima facie* case of obviousness, three basic criteria must be shown. First, there must be some suggestion or motivation, either in the cited art or in the knowledge generally available to one of ordinary skill in the art, to modify the cited art or to combine the cited art. Second, there must be a reasonable expectation of success. Finally, the cited art must teach or suggest all the claim features. *See* MPEP 706.02(j).

Conventionally, an organic acid magnesium salt is prepared by a reaction of a carboxylic acid or its salt with an inorganic magnesium compound in water in the form of suspension reaction, such as that described in Rieber et al. An organic acid magnesium salt obtained from this suspension has low purity. According to experiments of the present inventors, a magnesium salt of a monocarboxylic acid

having 6 to 9 carbon atoms prepared by such a suspension reaction dissolves in ethanol in an amount of about only 2 wt%.

The significant advantage of the invention is that a specific monocarboxylic acid is employed that contains very low amount of impurities as required by the independent claims (impurities 3 wt% or less), and the reaction is conducted using specific conditions (molar ratio, solvent identity). Thus, a clear solution is obtained as the reaction mixture. The organic metal salt obtained form such a clear solution has high solubility in various solvents such as ethanol. The independent claims specify that the metal salt ~~of the~~ can be dissolved in ethanol in an amount of 40 wt%. This is significant because this amount is about 20 times or more of the metal salt obtained by the conventional method a using a suspension reaction described above.

Rieber et al relates to a method for preparing metal soap granulates. In Rieber et al, metal salt fo rmation reaction is carried out in water as suspension reaction. For example, see each of examples of Rieber et al in columns 5-11. Specifically in Example 1, a hollow-sphered granulate is formed in the reaction mixture. This indicates that the metal salt includes a substantial amount of impurities, and thus, the resultant solubility in an organic solvent such as ethanol is poor. In this way, Rieber et al is quite different from the claimed invention.

There is no teaching or suggestion in Rieber et al that would have motivated one skilled in the art to provide an organic acid metal salt obtained by reacting a saturated monocarboxylic acid or its salt and an inorganic magnesium compound where 1) the saturated monocarboxylic acid or its salt contains impurities in an amount of 3 wt% or less, wherein the impurities are compounds selected from the group consisting of paraffin compounds, ketone compounds, long chain aldehydes, carboxylic acids having 3 carbon atoms or less, and carboxylic acids having at least 11 carbon atoms, 2) the molar ratio of the inorganic magnesium compound and the saturated monocarboxylic acid or its salt is 1:2.02 to 1:3 and the reaction is conducted in water or an organic solvent containing 10 wt% or more of water, and/or 3) the organic acid metal salt is characterized in that a solution prepared by dissolving the organic acid metal salt in

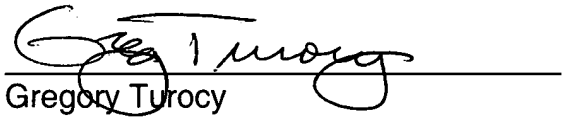
ethanol at a concentration of 40 wt% is clear after the solution is allowed to stand at 30°C for one hour. Therefore, Rieber et al cannot render claims 1-9, 15, and 16 obvious.

Should the Examiner believe that a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

In the event any fees are due in connection with the filing of this document, the Commissioner is authorized to charge those fees to our Deposit Account No. 50-1063.

Respectfully submitted,

AMIN & TUROCY, LLP



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